

# Holland & Knight

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July 13, 2022

*Via ECF*

Judge Pamela K. Chen  
Courtroom: 4F  
Chambers: N 631  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Second Revised Motion to Compel Arbitration*  
*Carlos Collazos v. Garda CL Atlantic, Inc.; 21-cv-02095-PKC-JRC*

Dear Judge Chen:

The undersigned represents Garda CL Atlantic, Inc. ("Garda") in its Second Revised Motion to Compel Arbitration of Individual Claims and Stay Litigation of Class Action Claims. On or about March 11, 2020, Plaintiff Carlos Collazos filed the above-referenced putative class action against Defendant Garda, which Garda removed to the Eastern District of New York on April 16, 2021. Defendant filed a motion for pre motion conference regarding a Motion to Compel Arbitration and Stay the Proceeding Pending Arbitration on September 15, 2021. At the pre motion conference, held on November 10, 2021, this court set a briefing schedule for the motion. The briefing schedule was postponed pending the court's review of a joint motion regarding the joinder of necessary parties. After resolution of the motion, and several letter motions from the parties for extensions of time, this court set a renewed briefing schedule for the motion on June 21, 2022.

In support of its application, please find the following attachments:

1. Notice of Motion
2. Declaration of Loren L. Forrest Jr.
3. Memorandum of Law In Support of Motion to Compel Arbitration
4. Revised Notice of Motion
5. Supplemental Declaration of Loren L. Forrest Jr.
6. Memorandum of Law In Support of Reply

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The Revised Notice of Motion is submitted given the addition of grounds for Defendant's Motion to Compel Arbitration, namely Article 75 of the New York CPLR, and § 301 of the Labor Management Relations Act ("LMRA").

Respectfully submitted,

HOLLAND & KNIGHT LLP

A handwritten signature in black ink, appearing to read "Loren L. Forrest Jr.", with a stylized flourish at the end.

Loren L. Forrest Jr.

Cc: All counsel of record via e-mail